

BestWeb CLEC, Ltd.

25 South Riverside Avenue
Croton-on-Hudson, NY 10520

914-271-4500 x101 (phone)
914-271-4292 (fax)
andy@bestweb.net

April 17, 2007

Federal Communications Commission
Washington, DC 20554

Re: Docket No. 06-172

Dear Members of the Commission:

BestWeb CLEC, Ltd. would like to register its strong OPPOSITION to the petition of the Verizon Telephone Companies for forbearance.

- Specifically, we object to the idea that Verizon would be exempt from the unbundling requirements within entire MSAs.
- Further, we would ask that the Commission stop allowing Verizon to be exempt from unbundling requirements for specific central offices – referred to as non-impaired COs.

Our reasoning is as follows:

Although there may be a certain amount of competition within an MSA or even within a CO, the vast majority of buildings within that MSA or CO are still served only by Verizon local loops. When you remove the unbundling requirement from Verizon, then customers within those buildings do not experience the value of competition.

Customers within those buildings can only get circuits at special access rates, which are far, far above the UNE rates.

You have created the ironic situation where, in non-impaired COs, some large customers get much better rates because competitors have built to them, but the vast majority of customers get worse rates than in an impaired CO. In other words, when a CO moves from impaired to non-impaired – supposedly because there is sufficient competition – rates to most customers go up.

Clearly, this is not a fair situation.

Therefore, we ask that the Commission not only reject Verizon's petition but also remove the distinction between impaired and non-impaired COs and require Verizon to provide UNE at all COs.

Thank you very much.

Sincerely yours,

Andrew Dickey
Vice President